

From: [Phillips, Pam](#)
To: [Tulis, Dana](#)
Subject: Re: West, Texas Situation - Answers to questions
Date: Thursday, April 18, 2013 9:43:07 AM

Thanks. We are reviewing now

From: Tulis, Dana
Sent: Thursday, April 18, 2013 9:42:07 AM
To: Phillips, Pam; Edlund, Carl
Cc: Irizarry, Gilberto
Subject: Fw: West, Texas Situation - Answers to questions

Here you go, we are major multi-tasking, COOP exercise, RICIN and Waco, apologize for the oversight.

From: Irizarry, Gilberto
Sent: Thursday, April 18, 2013 10:06:43 AM
To: Stanislaus, Mathy; Feldt, Lisa; Breen, Barry
Cc: Tulis, Dana; Stanton, Larry; Matthiessen, Craig; Jennings, Kim; Coleman, Sam; Broyles, Ragan; Webster, Susan
Subject: West, Texas Situation - Answers to questions

Mathy:

Below you'll find answer to several of the more recently asked questions.

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- WCS: EPA establishes the guidelines and parameters for the WCS and the facility conducts the analysis. As said before, although anhydrous ammonia can explode if you have it in a confined space at the right conditions, the impact is not as great as a toxic exposure. This is why the RMP does the ammonia WCS, not an exploding fertilizer. That's why we think pelletized or powdered fertilizer - maybe ammonium nitrate - exploded, not anhydrous ammonia. There's no "approval" of an RMP - it is submitted to EPA and others for review. We can question the validity of their analysis if we find they did it wrong.

- The facility failed to file an updated RMP in 2004 but did so in 2006; R6 did an inspection and cited them for this failure. That's the only issue raised.

- The vapor cloud WCS would likely address the nursing home and other possible receptors downwind. The WCS shows a 1.5 mile zone for a total release of 53,000 # of ammonia.

- Anhydrous ammonia is commonly used in the farming sector and there are probably other sources of nitrogen for farmers to use other than the liquid/vapor.

- The Tysons issue is ammonia refrigeration to keep the chickens cold, not for fertilization. There may be other refrigerants besides ammonia (propane, chlorofluorocarbons) but ammonia is commonly used.
- Ammonium nitrate (AN) is different from anhydrous ammonia (NH_3). AN fertilizer pellets can be made to explode (ie. Oklahoma City) while it is rather difficult to make liquified anhydrous ammonia (normally a gas at ambient conditions) explode.